

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

JESSE HAMMONS,	)	
	)	
Plaintiff,	)	
v.	)	Case No. 1:20-cv-02088-DKC
	)	
UNIVERSITY OF MARYLAND MEDICAL SYSTEM	)	
CORPORATION, et al.	)	
	)	
Defendants.	)	
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**JOINT STIPULATION REGARDING PLAINTIFF’S CONSOLIDATED  
INTERIM SEALING MOTION, MOTION FOR LEAVE TO FILE  
CERTAIN DOCUMENTS UNDER SEAL, AND MOTION FOR LEAVE TO  
FILE CERTAIN DOCUMENTS PUBLICLY**

The Parties have conferred regarding Plaintiff’s Consolidated Interim Sealing Motion, Motion for Leave to File Certain Documents Under Seal, and Motion for Leave to File Certain Documents Publicly (ECF No. 113, “Plaintiff’s Second Sealing Motion”), and stipulate and agree as follows:

1. Plaintiff filed his Second Sealing Motion on September 6, 2022, requesting that Exhibit 3 to Plaintiff’s Reply Memorandum of Law in Further Support of Plaintiff’s Cross-Motion for Summary Judgment (ECF No. 114, “Plaintiff’s Reply”) be filed publicly.
2. Exhibit 3 to Plaintiff’s Reply is an email produced in this litigation containing private information and designated confidential by Defendants.
3. The parties met and conferred between September 9, 2022, and September 13, 2022, on maintaining the confidentiality of certain information in Exhibit 3.
4. Following the parties’ meet and confer, the parties agreed that a public version of Exhibit 3 containing the redactions proposed in Exhibit A to this stipulation may be filed to protect personal and private information contained in the email.

5. The Parties agree that the redactions are consistent with the Confidentiality Order entered in this case because they protect the private information of Defendants' personnel and staff.

WHEREFORE, the Parties jointly stipulate and agree that, pursuant to the Confidentiality Order and Local Rules 104.13 and 105.11, Exhibit 3 to Plaintiff's Reply be filed publicly as proposed and redacted in Exhibit A to this stipulation.

Date: September 20, 2022

Respectfully Submitted,

/s/ Denise Giraudo

Denise Giraudo (Bar No. 29015)  
Paul Werner (admitted *pro hac vice*)  
Danielle Vrabie (admitted *pro hac vice*)  
Imad Matini (admitted *pro hac vice*)  
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
2099 Pennsylvania Ave., N.W., Suite 100  
Washington, D.C. 20036  
Tel: 202-747-1906  
Fax: 202-747-3933  
dgiraudo@sheppardmullin.com  
pwerner@sheppardmullin.com  
dvrabie@sheppardmullin.com  
imatini@sheppardmullin.com

*Counsel for Defendants*

/s/ Louis J. Ebert

Louis J. Ebert (Fed. Bar No. 02031)  
ROSENBERG MARTIN GREENBERG, LLP  
25 South Charles Street, 21st Floor  
Baltimore, Maryland 21201  
Telephone: (410) 727-6600  
Fax: (410) 727-1115  
lebert@rosenbergmartin.com

Aron Fischer (*pro hac vice*)  
Andrew D. Cohen (*pro hac vice*)  
Abigail E. Marion (*pro hac vice*)  
Jonathan S. Z. Hermann (*pro hac vice*)

Edward J. Delman (*pro hac vice*)  
PATTERSON BELKNAP WEBB & TYLER LLP  
1133 Avenue of the Americas  
New York, NY 10036  
(212) 336-2000  
afischer@pbwt.com  
acohen@pbwt.com  
amarion@pbwt.com  
jhermann@pbwt.com  
edelman@pbwt.com

Joshua A. Block (*pro hac vice*)  
Leslie Cooper (*pro hac vice*)  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad Street, 18th Floor  
New York, NY 10004  
Tel: (212) 549-2627  
Fax: (212) 549-2650  
jblock@aclu.org  
lcooper@aclu.org

Daniel Mach (*pro hac vice*)  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
915 15th Street, NW  
Washington, DC 20005  
Tel: (202) 675-2330  
Fax: 202-546-0738  
dmach@aclu.org

*Counsel for Plaintiff Jesse Hammons*